

*Shukai Chen, et al.*

v.

*Target Corporation*

Court File No.: 21-cv-1247 (DWF/DJF)

Exhibit 24

to Declaration of Annie Santos in Support of  
Target Corporation's Opposition to  
Plaintiffs' Motion to Enforce Settlement  
Agreements

(Filed Under Seal)

**Santos, M. Annie**

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**From:** David Cialkowski <David.Cialkowski@zimmerreed.com>  
**Sent:** Wednesday, January 18, 2023 8:46 AM  
**To:** Santos, M. Annie  
**Cc:** Dennis A Lienhardt; Weller, Jennifer; Schultz, David; Fernandez, Barbara; ssa; Dana E. Fraser; Bilal A. Essayli; Craig R. Heidemann  
**Subject:** Chen v. Target | Motion to enforce | Sealing procedure

**\*\*\* External email \*\*\***

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Hello Annie—

We are set to file the motion to enforce settlements the parties met and conferred about before the holidays. We recall that during our discussion, you noted Target's feeling that the papers should be filed under seal. Our research is indicating that the motion should likely not be filed under seal, so that would be our position. But we understand that position is disputed at this time.

Local Rule 5.6's sealing procedures do not appear to contemplate the situation where only the party opposing the motion believes the movant's documents should be filed under seal, because the rule puts the onus on the filing party to assert confidentiality. To deal with this, as part of the temporary sealing procedure under LR 5.6(d)(1)(A) Plaintiffs are willing to place the documents under temporary seal and to include a statement in their filing saying that Target believes the entire document is confidential or that redaction is impracticable, so that the parties can address the propriety of continued sealing as part of the Joint Motion under LR 5.6(d)(2).

Please let us know if that works for you.

Best regards,  
Dave

**DAVID CIALKOWSKI** | PARTNER

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